

**REMARKS/ARGUMENTS**

In view of the amendments and remarks herein, favorable reconsideration and allowance of this application are respectfully requested. By this Amendment, claim 5 has been amended to correct typographical errors. Claims 1-16 are pending for further examination.

In response to the objection to the specification, Applicant has amended the specification in the manner suggested by the Examiner. Applicant has also amended claim 5 in the manner suggested by the Examiner. Thus, withdrawal of these objections is respectfully requested.

Claims 1-16 have been rejected under 35 USC 102(e) as allegedly being anticipated by Ventrella. For at least the following reasons, Applicant respectfully submits that Ventrella fails to teach each and every element of the claimed invention, as required for anticipation under Section 102. Thus, withdrawal of this rejection is requested.

Claims 1 is directed to a method of animating a user-controlled character in a virtual environment, including, *inter alia*, defining a tag at a location in the virtual environment, and assigning tag information to the tag that designates a type of reaction for the character when in proximity to the tag. The tag is detected when the character is within a predetermined proximity to the tag, and the location of the tag and the tag information are used to dynamically modify the character's animation in real time.

The Examiner has not identified any disclosure in Ventrella that discloses the tag as defined in claim 1. For example, Ventrella does not disclose the feature of defining a tag at a location in a virtual environment. Nor does Ventrella disclose using the location of the tag and the tag information to dynamically modify the character's animation in real time. Instead, the Examiner has identified information stored in the "genes" of an avatar that controls certain attributes of the avatar. This disclosure in Ventrella does not disclose or suggest the claimed feature of defining a tag at a location in a virtual environment or using the location of the tag and the tag information to dynamically modify the character's animation in real time. As a result, Applicant respectfully submits that Ventrella does not anticipate claim 1. Thus, withdrawal of this rejection is respectfully requested.

Applicant also submits that independent claim 7 is not anticipated by Ventrella. Claim 7 recited a method for controlling the animation of a character in a virtual world, including, *inter alia*, defining a plurality of tags at defined locations with the virtual world, wherein each tag designates a reaction to be made by the character when the character is within a predefined virtual proximity to the tag, and assigning a priority value to each tag. When the character is within a predetermined virtual proximity to at least one of the tags, a dynamic animation sequence is generated for the character based on the tag having the highest priority among the tags within the predetermined proximity to the character. As explained above, Ventrella does not teach or suggest defining a tag at a predetermined location in the virtual world, much less defining a plurality of such tags.

Ventrella also fails to teach the feature of generating a dynamic animation sequence for the character when the character is within a predetermined virtual proximity to the tag. Thus, Applicant respectfully submits that independent claim 7 is also not anticipated by Ventrella.

Independent claim 12 has similar limitations to claim 7 and is therefore believed to be allowable for substantially the same reasons discussed above.

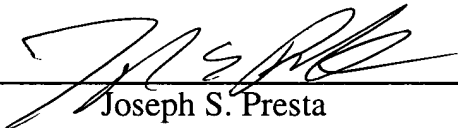
In view of the foregoing amendments and remarks, Applicant believe that all of the pending claims clearly and patentably distinguish the prior art of record and are in condition for allowance. Thus, withdrawal of the rejection and passage of this case to issuance at an early date are earnestly solicited.

Should the Examiner have any questions, or deem that any further issues need to be addressed prior to allowance, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

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